

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK**

ADVANCED ACCESS CONTENT SYSTEM
LICENSING ADMINISTRATOR, LLC,

Plaintiff,

v.

LANNY SHEN d/b/a DVDFAB AND
FENGTAO SOFTWARE INC., SUNREG
TECHNOLOGIES LTD. d/b/a DVDFAB AND
FENGTAO SOFTWARE INC., FENG TAO
d/b/a DVDFAB AND FENGTAO SOFTWARE
INC., SHEN XINLAN d/b/a AUDIO-DVD
CREATOR, and JOHN DOE, JANE DOE and/or
XYZ COMPANY d/b/a DVDFAB, RIPPERBLU-
RAY.COM, DVDFABB.COM and
DVDFFAB.COM,

Defendants.

NO. 14-cv-1112 (VSB)

**SUPPLEMENTAL DECLARATION
OF MATTHEW HEWLETT IN
OPPOSITION TO DEFENDANT
FENG TAO d/b/a DVDFAB AND
FENGTAO SOFTWARE INC.'s
MOTION TO VACATE DEFAULT**

MATTHEW HEWLETT, under penalty of perjury, declares and says:

1. I am a private investigator licensed by the State of North Carolina and employed by Vaudra, Ltd. ("Vaudra"), a North Carolina-based investigation company. I have been employed as a private investigator, focusing on intellectual property infringement for the past ten years. I have been employed by Vaudra since October 2009. I have conducted and/or participated in approximately seven-hundred investigations involving intellectual property violations, including through Internet sales.

2. I submit this declaration on behalf of plaintiff Advanced Access Content System Licensing Administrator, LLC ("AACS LA" or "Plaintiff") in opposition to defendant Feng Tao d/b/a DVDFab and Fengtao Software Inc.'s ("Feng Tao" or "Defendant Feng Tao") motion to

amend the Order for preliminary injunction, entered March 4, 2014 [Doc. No. 21], and proposed motion to vacate the entry of default by the Clerk's Certificate of Default, entered Mar. 18, 2014 [Doc. No. 26].

3. The following actions were undertaken by myself, or in conjunction with other Vaudra investigators. If called upon as a witness, I could testify to the following from personal knowledge and/or a review of Vaudra's business files.

4. At the request of AACS LA, Vaudra investigated defendants Lanny Shen d/b/a DVDFab and Fengtao Software Inc., SunReg Technologies Ltd. d/b/a DVDFab and Fengtao Software Inc., Feng Tao d/b/a DVDFab and Fengtao Software Inc., Shen Xinlan d/b/a Audio-DVD Creator, and John Doe, Jane Doe and/or XYZ Company d/b/a DVDFab, RipperBlu-ray.com, DVDFabb.com and DVDFfab.com's ("Defendants") sales of software products designed to circumvent AACS LA's AACS Technology and continues to investigate the same.

5. A printout of an email exchange we had with an "Anny" using the email address anny@dvdFab.com is attached hereto as Exhibit A.

6. A printout of an email exchange we had with an "ellen song" using the email address ellen-song@dvdFab.cn is attached hereto as Exhibit B.

7. From the United States and using a United States IP address, we accessed the websites located at the domain names listed in Paragraph 29 of the Declaration of Feng Tao dated June 20, 2014 (which are identified as ".com sites that are not based in the US or primarily targeted to the US"): Baidu.com, QQ.com, Taobao.com, Hao123.com, Weibo.com, Tmall.com, Sohu.com and VK.com. Screenshots of all of these websites are attached hereto as Exhibit C. As shown in Exhibit B, all of the websites default to the Chinese language when accessed from

the United States using a United States IP address, except for vk.com, which defaults to the English language and identifies itself as a “European social network”.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11 day of July 2014 in Charlotte, North Carolina.



Matthew Hewlett